# REMARKS

Claims 1-3, 5-16, and 18-25 are pending the application. Claims 1, 18, 21, 22, and 25 have been amended. No new matter is added by the amendments. No claims have been allowed.

#### Objections to the claims

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Claims 1, 21, and 25 were objected to for various formalities. Applicants have amended the claims for further clarification. Applicants respectfully submit that the claims as amended overcome the objections. Withdrawal of the objections is respectfully requested.

### Rejections under 35 U.S.C. § 112

Claims 1,-3, and 5-17 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants have amended the claims, and respectfully submit that the claims as amended are allowable under 35 U.S.C. § 112, second paragraph. Withdrawal of the rejection is respectfully requested.

#### Rejections under 35 U.S.C. § 101

Claims 1,-3, 5-16, and 18-24 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. While Applicants do not intend to agree that the claims as submitted are not in compliance with under 35 U.S.C. § 101, Applicant have amended the claims to more clearly point out that each claim is directed to patentable subject matter under 35 U.S.C. § 101. Withdrawal of the rejection is respectfully requested.

#### Rejections under 35 U.S.C. § 103

A. Claims 1,-3, 5-10, 12-16, 18-20 and 22 were rejected as being unpatentable over Bailey U.S. Patent No. 5,227,967, and further in view of Parham et al. (U.S. Patent No. 7,370,195, and further in view of Gilbert et al. (U.S. Patent Pub. No 2002/0284170) Applicants respectfully submit that the claims as amended would not

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have been obvious to one of ordinary skill in the art.

Applicants are appreciative of the Examiner's careful consideration of the previous amendments and remarks. With reference to the section 'Response to Arguments' (page 2 of the Office action), Applicants respectfully submit that the claims as amended are not taught or suggested by the prior art as stated. For example, (referring to page 3 of the Office action) the examiner cites Col 1, lines 21-30 of Bailey as teaching "if there is no single identifier match upon applying a generic rule, and no further generic rules apply, applying an FI-specific rule..." Applicants respectfully disagree.

Bailey is limited to storing and retrieving data within a contained database. Bailey manipulates the stored data. However, Bailey does not teach or suggest retrieving data from financial institutions via a network. Nor does Bailey teach or suggest FI-specific rules. Col 1, lines 21-30 recites "account rules in force for a particular portfolio". This is to be distinguished from FI-specific rules. The database of Bailey is self-contained and does not receive data from various financial institutions that may each have FI-specific rules. "Portfolio rules" refer to rules applicable in the self-contained database system of Bailey to a specific user portfolio within that database.

Parham is cited for disclosing "…normalized…, and across multiple accounts…" Because only a portion of claim language is quoted in the Office action at page 11, Applicants are assuming that the Office action is stating that Parham teaches "defining a plurality of identifiers, wherein an identifier is at least one character that is associated with a financial data element, such that retrieved financial data is normalized across the plurality if financial institutions, and across multiple accounts. Applicants disagree. Not at the cited passages and figures, or anywhere in Parham, is "normalized" as claimed taught, nor is "… and across multiple accounts" as claimed taught. Parham is dedicated to teaching moving principals across security boundaries without service interruption. Principals are persons wishing to access <u>computer accounts</u> within a network. Nothing is taught regarding <u>financial accounts</u>, financial institutions, data identifiers for financial-related data, or "normalizing" anything whatsoever.

Gilbert is cited for "normalizing". However, Gilbert does not teach normalizing

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financial data across multiple financial accounts, but merely mentions the word in the context of normalizing data content in virtually any format required by the end user or client (paragraph [0020].

[0020] Moreover, effective management of content requires the continual execution of a series of complex data manipulation activities. The exemplary DACMS can provide data parsing, cleansing, normalization, validation, transformation, and delivery of content in virtually any format required by the end user or client.

[0022] The data may be obtained from a number of disparate sources. For example, accessible systems from which data can be obtained range from a "Web Store Front" or a Point Of Sale (POS) device to an internal production planning system or an external supplier's inventory database.

As in the paragraphs above, Pelham is focused on dealing with data from many different sources and in potentially many different electronic forms. Thus Pelham does not teach regarding normalizing financial data that is electronically similar (on a computer signaling protocol level) but can be disparate on a higher level.

For all of these reasons, Applicants respectfully submit that the claims as amended would not have been obvious in view of the suggested combination of references. Independent claims 1, 18, 21, 22, and 25 include limitations distinguished from the references. The dependent claims are allowable as including further limitations on their respective base claims. Withdrawal of the rejection is respectfully requested.

would not have been obvious in Furthermore, neither Parham nor Gilbert supply the deficiencies of Bailey such that the suggested combination would result in the invention as claimed. Therefore, Applicants respectfully submit that claims that the claims would not have been obvious in view of Bailey, Parham and Gilbert.

B. Claim 11 was rejected as being unpatentable over Bailey, in view of Parham and Gilbert, and further in view of Suresh (U.S. Patent Pub. No. 2004/0078355). Suresh teaches:

[0061] According to another aspect of the present invention, a method for using a database comprises organizing a plurality of data elements within the database such that

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the data is locatable without a separate index, locating a desired data element in response to a query, and retrieving the located data element. Optionally, a plurality of data elements within the database are linked to one another. Such linking is preferably performed automatically by the computer. However, linking may also be performed manually by a user.

Claim 11 recites manually associating identifiers with financial data elements having an associated exception identifier. This is in contrast to Suresh's manual database linking.

Furthermore, Applicants respectfully submit that Suresh does not make up the stated deficiencies of other cited art, including Bailey. As claim 11 includes further limitations on its base claim, and Suresh is distinguished from claim 11, Applicants respectfully submit that claim 11 would not have been obvious to one of ordinary skill in the art in view of the cited references.

C. Claims 23-24 were rejected as being unpatentable over Bailey, Parham, and Gilbert, and further in view of Schreiber (U.S. Patent Pub. No.2002/0147727 A1, hereinafter "Schreiber").

Schreiber is cited for teaching "identifiers or code location and limiting modification errors which cause incorrect data being processed (Schreiber, (para) 0042 lines 2-3, 4-9). Whereas the combination teaches user preferences with respect to storage and retrieval of the data with implies customization of the classification (rules) of the attributes. (Office action, page 29). The Examiner correctly states that Schreiber teaches limiting modification errors, referred to in Schreiber as "data corruption reduction". however, this has no relationship to the invention of claims 23 and 24. As Schreiber explains at paragraph 0042, a server may have two (2) locations "1000", but a single code for modifying both locations. Modifying location as used in Schreiber infers writing or overwriting data in a database or memory device location. Claims 23 and 24, in contrast, teaches modifying one or more generic rules that associate identifiers with data elements after determining an association between identifiers and data elements. Schreiber does

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not teach modifying rules as claimed, but rather teaches reducing location modification errors by always using a single code for each location.

Applicants respectfully submit that dependent claims 23 and 24 would not have been obvious in view of the cited references. Schreiber does not teach or suggest the limitations of claims 23 and 24. In addition, Applicants respectfully refer to the remarks concerning independent claim 22. The dependent claims 23 and 24 include yet further limitations on allowable claim 22. For the reasons discussed above, Applicants respectfully submit that claims 23 and 24 would not have been obvious to one of ordinary skill in view of the prior art.

## **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants respectfully submit that the claims are in condition for allowance. If the Examiner would like to speak to the undersigned representative to expedite allowance of the application, the Examiner is encouraged to do so.

Respectfully submitted,

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